

Exhibit B



April 15, 2018

VIA ELECTRONIC COURT FILING

The Honorable Jesse M. Furman
United States District Court
Southern District of New York

Re: *In re: General Motors LLC Ignition Switch Litig.*,
14-MD-2543 (JMF); 14-MC-2543

Dear Judge Furman:

Pursuant to Order No. 131 ¶ 11 (Docket No. 4499), Co-Lead Counsel for the Economic Loss Plaintiffs and counsel for New GM, having met and conferred, write jointly to request a further short extension on certain deadlines relating to the economic loss schedule. This request is necessary as the parties continue to work in good faith to complete expert discovery.

First, the parties propose to adjust the current expert discovery deadlines as follows: moving the deadline for Plaintiff expert rebuttal reports from April 20, 2018 to **Friday, May 18, 2018**, and the deadline to depose New GM's experts and Plaintiffs' rebuttal experts from May 4, 2018, to **Friday, June 22, 2018**.

Second, and flowing from the parties' proposed adjustment to the completion of expert discovery, the parties propose to adjust the current summary judgment, class certification, and *Daubert* motion practice deadlines by moving the deadline for opening briefs from May 4, 2018 to **Friday, June 29, 2018**; opposition briefs from June 22, 2018 to **Friday, August 24, 2018** (including any *Daubert* motions that Plaintiffs may file in connection with New GM's summary judgment motion and any remaining *Daubert* motions that New GM may file limited to plaintiffs' class certification motion); reply briefs from July 20, 2018 to **Friday, September 21, 2018**; and certain replies in support of *Daubert* briefing from August 10, 2018 to **Friday, October 12, 2018**.

Third, the parties propose to change the hearing on summary judgment and class certification contemplated in Order No. 131 from "September or October 2018 or as soon thereafter as is reasonably practicable" to "October or November 2018 or as soon thereafter as reasonably practicable."

This is the parties' third request for an extension of the deadlines in Order No. 131, and, if granted, would only modestly extend the timing of resolving summary judgment and bellwether class certification motions in the economic loss case. Consistent with Order No. 131, the parties have attached as Exhibit 1 hereto a revised economic loss deadline chart incorporating the parties' proposed extension request.

Respectfully,

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cc: MDL Counsel of Record

Exhibit 1

[PROPOSED] ECONOMIC LOSS DEADLINES

Deadline	Submission	Party or Parties
May 18, 2018	Plaintiff Expert Rebuttal Reports	Lead Counsel
June 22, 2018	Deadline to Depose New GM's Experts and Plaintiffs' Rebuttal Experts	Both Parties
June 29, 2018	Summary Judgment Motion	New GM
June 29, 2018	New GM's <i>Daubert</i> Motions (if any) in connection with its Summary Judgment Motion	New GM
June 29, 2018	Class Certification Motion	Lead Counsel
August 24, 2018	Summary Judgment Opposition Brief	Lead Counsel
August 24, 2018	Plaintiffs' <i>Daubert</i> Motions (if any) in connection with GM's Motion for Summary Judgment	Lead Counsel
August 24, 2018	Plaintiffs' response to GM's June 29 <i>Daubert</i> Motions	Lead Counsel
August 24, 2018	Class Certification Opposition Brief	Lead Counsel
August 24, 2018	New GM's remaining <i>Daubert</i> Motions (if any) limited to Plaintiffs' Motion for Class Certification (motions must not duplicate arguments as to any experts already the subject of GM's June 29 <i>Daubert</i> Motions)	New GM
September 21, 2018	Summary Judgment Reply Brief	New GM
September 21, 2018	New GM's reply in support of June 29 <i>Daubert</i> Motions and Opposition to Plaintiff's <i>Daubert</i> Motions	New GM
September 21, 2018	Class Certification Reply Brief	Lead Counsel
September 21, 2018	Plaintiffs' opposition to New GM's August 24 <i>Daubert</i> Motions	Lead Counsel
October 12, 2018	New GM's reply in support of its August 24 <i>Daubert</i> Motions	New GM

Deadline	Submission	Party or Parties
October 12, 2018	Plaintiffs' reply in support of their August 24 <i>Daubert</i> Motions	Lead Counsel
October or November 2018 (or as soon thereafter as is reasonably practicable)	Class Certification/ Summary Judgment Hearing	Both Parties